



**ILLINOIS COMMERCE COMMISSION**

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JAN 23 2001

January 18, 2001

FCC MAIL ROOM

Magalie R. Salas, Secretary  
Federal Communications Commission  
1919 M Street NW. Room 222  
Washington D.C. 20554

RE: CC Docket No. 00-199 – Initial Comments of the ICC in the Matter of 2000  
Biennial Review – Comprehensive Review of the Accounting Requirements and  
ARMIS Report Requirements for Incumbent Local Exchange Carriers: Phase 2.

Dear Ms. Salas:

Pursuant to Sections 1.49, 1.415, and 1.419 of the Federal Communications Commission's (FCC) Rules of Practice and Procedures, the Illinois Commerce Commission ("ICC) respectfully submits these comments regarding the FCC's above-captioned Notice of Proposed Rulemaking adopted October 12, 2000, and released October 18, 2000.

In 1999, the FCC initiated a two-phased comprehensive review of its accounting rules and the related reporting requirements for incumbent local exchange carriers (ILECs). In this NPRM, the FCC is seeking comment regarding its proposals to further streamline accounting and reporting requirements for ILECs in the near term (Phase 2) and the long term (Phase 3).

Generally, the ICC applauds the efforts of the FCC to streamline and make more efficient the accounting and reporting requirements for these companies. However, we are concerned that streamlining not occur at the expense of necessary recordkeeping for both state and federal purposes.

The ICC has reviewed Docket No. 00-199 and the reply comments of the NARUC, and agrees and endorses the comments of the NARUC on this matter.

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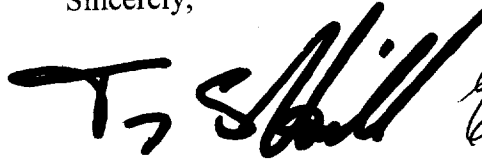
Ms. Magalie R. Salas, Secretary  
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The ICC believes that there must be consistent accounting and reporting requirements for all carriers as long as there are universal service funds, revenue sharing plans, regulated services, and carriers of last resort. CFR Part 32, Uniform System of Accounts (USOA), and ARMIS encourage each jurisdiction to prescribe a single accounting system instead of 52 systems.

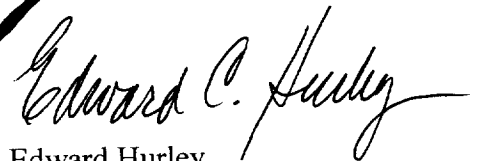
Sincerely,



Richard Mathias  
Chairman



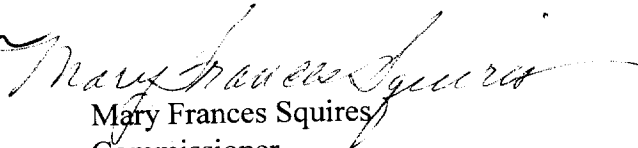
Terry S. Harvill  
Commissioner



Edward Hurley  
Commissioner



Ruth Kretschmer  
Commissioner



Mary Frances Squires  
Commissioner